UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

RONALD JOSEPH BESSER, JR.

DANA LOUISE BESSER : CHAPTER 13

Debtor

:

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE : CASE NO. 5-25-bk-00204

Movant

:

RONALD JOSEPH BESSER, JR. DANA LOUISE BESSER

Respondent :

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 10th day of March 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

- 1. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid.

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 10th day of March 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

VINCENT RUBINO, ESQUIRE 712 MONROE STREET P.O. BOX 511 STROUDSBURG, PA 18360-0511

/s/Tammy Life

Office of Jack N. Zaharopoulos Standing Chapter 13 Trustee